

FCC Received December 20, 1993 @ 3:45 p.m.
Dana P. Bradshaw

ORIGINAL

TRANSCRIPT OF PROCEEDINGS

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

IN THE MATTER OF:

MM DOCKET NO. 93-75

TRINITY BROADCASTING OF FLORIDA, INC.
and
GLENDALE BROADCASTING COMPANY
Miami, Florida

RECEIVED

JAN 1 0 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

DATE OF HEARING: December 8, 1993

VOLUME: 12

PLACE OF HEARING: Washington, D. C.

PAGES: 1539-1735

FREE STATE REPORTING, INC.
Court Reporting Depositions
D.C. Area (301) 261-1902
Balt. & Annap. (410) 974-0947

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

JAN 10 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

MM DOCKET NO. 93-75

In the matter of:

TRINITY BROADCASTING OF FLORIDA, INC.
and
GLENDALE BROADCASTING COMPANY

Miami, Florida

The above-entitled matter came on for hearing pursuant to Notice before Judge Joseph Chachkin, Administrative Law Judge, at 2000 L Street, N.W., Washington, D.C., in Courtroom No. 3, on Wednesday, December 8, 1993, at 9:00 a.m.

APPEARANCES:

On behalf of Trinity Broadcasting of Florida, Inc.:

NATHANIEL EMMONS, Esquire
CHRISTOPHER HOLT, Esquire
EUGENE MULLIN, Esquire
HOWARD TOPEL, Esquire
Mullin, Rhyne, Emmons and Topel, P.C.
1000 Connecticut Avenue, Suite 500
Washington, D.C. 20036-5383

On behalf of Glendale Broadcasting Company:

LEWIS COHEN, Esquire
JOHN SCHAUBLE, Esquire
Cohen & Berfield
1129 20th Street, N.W., Suite 507
Washington, D.C. 20036

On behalf of S.A.L.A.D.:

DAVID HONIG, Esquire
DAVID McCURDY, Esquire
1800 N.W. 187 Street
Miami, Florida 33056

FREE STATE REPORTING, INC.
Court Reporting Depositions
D.C. Area (301) 261-1902
Balt. & Annap. (410) 974-0947

1 APPEARANCES (Continued):

2 On behalf of Mass Media Bureau:

3 GARY SHOOK, Esquire
4 GARY SCHONMAN, Esquire
5 2025 M Street, N.W., Suite 7212
6 Washington, D.C. 20554
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

FREE STATE REPORTING, INC.
Court Reporting Depositions
D.C. Area (301) 261-1902
Balt. & Annap. (410) 974-0947

I N D E X

MRS. DUFFDIRECTCROSSREDIRECTRECROSS

Pearl Jane Duff

By Mr. Cohen

1543

By Mr. Schonman

1549

E X H I B I T SEXHIBITSIDENTIFIEDRECEIVEDREJECTED

Bureau Exhibit 414

1700

Hearing Began: 9:00 a.m.

Hearing Ended: 4:00 p.m.

Lunch Began: 12:30 p.m.

Lunch Ended: 1:30 p.m.

FREE STATE REPORTING, INC.
 Court Reporting Depositions
 D.C. Area (301) 261-1902
 Balt. & Annap. (410) 974-0947

P R O C E E D I N G S

(9:00 a.m.)

JUDGE CHACHKIN: On the record. Mr. Cohen?

MR. COHEN: Yes. Your Honor, at the close of the hearing yesterday, you permitted me to resume questioning today and my questions are going to use as a backdrop and frame of reference, if you will, this Commission letter. I'm not going to be asking any questions about it, so I don't know that I -- with -- through this witness, so I don't know that I need to mark it. If it becomes necessary I will, Your Honor.

JUDGE CHACHKIN: All right.

MR. COHEN: I'm not going to give the reporter a copy either.

(Asides.)

MR. COHEN: Did I foul you up, Ms. Reporter?

COURT REPORTER: Hello?

MR. COHEN: Are we still plugged in?

COURT REPORTER: Yes.

MR. COHEN: I'm sorry. You, you might want to put -- can we go off the record, Your Honor?

JUDGE CHACHKIN: Yes.

(Off the record.)

(On the record.)

Whereupon,

PEARL JANE DUFF

having previously been duly sworn, was called as a witness

1 herein and was examined and testified as follows:

2 DIRECT EXAMINATION

3 BY MR. COHEN:

4 Q So, if I'm not going to be asking you, underscore,
5 not going to be asking you questions about the -- this letter,
6 what, what I do want to do is a foundation for a few ques-
7 tions, ask you do you recall there came a time that Mr. Dunne
8 sent you this letter?

9 MR. TOPEL: You mean Mr. May, right?

10 MR. COHEN: Well, I think there's an exhibit -- was
11 it Mr. May? I guess your point's well-taken. There's an
12 exhibit in the record which I referred to yesterday which
13 referred to a, a letter to you. I think it's -- if I can have
14 a second I'll find it, Your Honor. It's Glendale Exhibit 198,
15 I think -- or 97. Maybe it's also -- yes, it's, it's Glendale
16 Exhibit 198. Maybe it's a Common Exhibit, Exhibit -- if it's
17 a Common Exhibit, I'll tell you in a second. No, it's not a
18 Common Exhibit. It's Glendale Exhibit 198, Mrs. Duff. You
19 might look at that for a second to help you refresh your
20 recollection. From Mr. May. Just --

21 MRS. DUFF: See if I have it.

22 MR. COHEN: This is just a reference. Do you recall
23 -- take as much time as you need.

24 JUDGE CHACKIN: Well, the witness has the letter.
25 Go on, Mr. Cohen.

1 MR. COHEN: Okay.

2 BY MR. COHEN:

3 Q My question is do you recall receiving the, the
4 Commission's letter from Mr. May?

5 A Yes, I do.

6 Q Okay. Now, what I want to ask you about, ma'am, is
7 this letter is dated, as you notice, March 30, 1992. Do you
8 see that?

9 A Yes.

10 Q Okay. My questions all relate to prior to the day
11 you received this Commission letter. This Commission letter
12 requested a substantial amount of information from NMTV, and
13 that's what the letter -- there are several paragraphs, 15, 15
14 paragraphs requesting information from NMTV. My question is
15 was it ever reported to the Commission prior, prior to re-
16 sponding to this March 30, 1992, letter that TBN employees
17 supervised the construction of the Odessa station?

18 A That TBN employees supervi-- yes, because it had to
19 be in the engineering. Ben Miller, I believe, signed the
20 engineering.

21 Q He signed the engineering as the technical consul-
22 tant. But in that, in that submission, did he state that he
23 had supervised the construction of the Odessa station?

24 A I don't know if that was a requirement of the appli-
25 cation, but he certainly did sign the application as being the

1 engineering consultant.

2 Q Okay. And did -- was it ever reported prior to
3 March 30, 1992, that Mr. Miller had supervised the construc-
4 tion of the Portland station?

5 A He signed the engineering.

6 JUDGE CHACHKIN: In what capacity?

7 MRS. DUFF: As a consultant for engineering.

8 JUDGE CHACHKIN: For whom?

9 MRS. DUFF: Without looking at the application, I
10 haven't focused on that.

11 JUDGE CHACHKIN: So, you don't know whether or not
12 he signed it and, and in his statement he made any reference
13 to TBN? You don't know that?

14 MRS. DUFF: Not without looking at the application.

15 JUDGE CHACHKIN: All right.

16 BY MR. COHEN:

17 Q Was it reported to the Commission prior to March 30,
18 1992, that TBN provided technical and operational support for
19 NMTV?

20 A I, I can't remember whether I focused on that or
21 not.

22 Q Do you recall -- strike that. Was it reported to
23 the Commission prior to March 30, 1992, that TBN provided
24 operator and maintenance manuals to NMTV?

25 A I don't think that would have been a part of the,

1 the application. I don't ever remember seeing a, a form that
2 requests that information.

3 Q Was it reported to the Commission prior to March 30,
4 1992, that TBN employees provided transmitter site service,
5 services for NMTV?

6 A I can't remember focusing on that.

7 Q Was it reported to the Commission prior to March 30,
8 1992, that TBN provided station and studio construction ser-
9 vices for NMTV?

10 A I don't remember focusing on that either.

11 Q Was it reported to the Commission prior to March 30,
12 1992, that TBN employees handled the purchasing of equipment
13 and supplies for NMTV?

14 A I don't remember focusing on that either.

15 Q Was it reported to the Commission prior to March 30,
16 1992, that TBN donated equipment and supplies to NMTV?

17 A I didn't focus on that.

18 Q Was it reported to the Commission prior to respond-
19 ing to the Commission's March 30, 1992, letter that TBN pro-
20 vided payroll services for NMTV?

21 A I wasn't focusing on that.

22 Q Same question for accounts payable service and
23 bookkeeping?

24 A I did not focus on that.

25 Q Was it reported to the Commission prior to the

1 Commission's letter of March 30, 1992, that TBN provided the
2 services which were set forth in the Agreement to Provide
3 Business Services, which is Bureau Exhibit 337?

4 A I did not focus on it.

5 Q Was it provided -- was it reported to the Commission
6 prior to March 30, 1992, that TBN had no checking account
7 prior to 1987?

8 A I did not focus on that.

9 Q Was it reported to the Commission prior to March 30,
10 1992, that no NMTV officer who was not a TBN employee ever
11 signed an NMTV check?

12 A I did not focus on that.

13 Q Was it ever reported to the Commission prior to
14 March 30, 1992, that TBN provided NMTV with an open line of
15 credit?

16 A I didn't focus on that.

17 Q Was it ever reported to the Commission prior to
18 March 30, 1992, that TBN and NMTV had similar insurance and
19 benefit plans?

20 A I did not focus on that.

21 Q Was it reported to the Commission prior to March 30,
22 1992, that TBN utilized the services of Plank Construction
23 Company and Media Services Agency?

24 A I did not focus on that.

25 Q Was it reported to the Commission prior to March 30,

1 1992, that NMTV tax returns were prepared by the same accoun-
2 tants who prepared TBN's return?

3 A I did not focus on that.

4 Q Was it reported to the Commission prior to March 30,
5 1992, that NMTV utilized the services of Norman Juggert as a
6 -- as, as a attorney?

7 A I did not focus on that.

8 MR. COHEN: I have no further questions, Your Honor.
9 Thank you.

10 JUDGE CHACHKIN: All right. Who's going to handle
11 your counsel?

12 MR. SHOOK: Your Honor, may we have one minute to --

13 JUDGE CHACHKIN: Yes.

14 MR. SHOOK: Okay.

15 JUDGE CHACHKIN: You want to go off the record?

16 (Off the record.)

17 (On the record.)

18 MR. COHEN: On the record. I've been informed that
19 I misstated something on the record by Mr. Shook. And when I
20 should have said NMTV I said TBN. And I --

21 JUDGE CHACHKIN: Well, why don't you ask it so that
22 it will be clear on the --

23 MR. COHEN: Okay. Can I first make sure the -- by
24 conferring for one second that I know which questions?

25 JUDGE CHACHKIN: All right. We'll go off the

1 record.

2 (Off the record.)

3 (On the record.)

4 JUDGE CHACHKIN: Mr. Cohen, you have one further
5 question --

6 MR. COHEN: Yes.

7 JUDGE CHACHKIN: -- you want to clari--

8 MR. COHEN: Yes.

9 JUDGE CHACHKIN: -- clarify something? Go ahead.

10 BY MR. COHEN:

11 Q I think I may have misstated the facts earlier, Mrs.
12 Duff, and I'd like to ask you one more question. Was it
13 reported to the Commission prior to responding to the
14 Commission's letter of March 30, 1992, that NMTV had no check-
15 ing account prior to 1987?

16 A I did not focus on that.

17 MR. COHEN: Thank you, Your Honor. I have no fur-
18 ther questions.

19 JUDGE CHACHKIN: All right. Who's going to handle
20 the Bureau questioning?

21 MR. SCHONMAN: I am, Your Honor.

22 JUDGE CHACHKIN: Go ahead.

23 CROSS-EXAMINATION

24 BY MR. SCHONMAN:

25 Q Good morning, Mrs. Duff. My name is Gary Schonman.

1 I'm co-counsel for the Mass Media Bureau and I have some
2 questions for you. Before I start, though, if at any time I,
3 I ask you a question and you don't understand it or you
4 haven't heard it properly and you're, you're not satisfied
5 that you understand what it is I'm asking, please say so and
6 ask me to repeat the question and I certainly will clarify it
7 if I know to.

8 As I understand your direct testimony, you came to
9 work for TBN in 1979?

10 A That's correct.

11 Q Can you tell me how that came about?

12 A I started out as a volunteer in June of 1979 and
13 while I was volunteering I applied for a position. At that
14 time, I was there at the studio on a regular basis volunteer-
15 ing. While I was there, during, I think it was, about the
16 second -- first or second week, Mr. Crouch had his secretary
17 to call me and ask me to come in to his office and see him,
18 and he offered me a position as a Public Affairs Director.
19 And --

20 Q Who, who did you interview with for -- did you
21 interview with anyone when you applied for a volunteer job?

22 A Yes. I interviewed with the Dire-- then Director of
23 Finance, John Cusoria (phonetic sp.). The position that he
24 suggested I might be interested in, the supervisor was on
25 vacation, and so I was just sort of waiting for the supervisor

1 to return.

2 Q So, you volunteered for approximately two weeks
3 before Mr. Crouch contacted you?

4 A Yes.

5 Q And did there come a time when you were offered a
6 position on TBN's Board?

7 A Yes. This happened at -- simultaneously, because my
8 pastor, who was well-acquainted with Mr. Crouch, had recom-
9 mended me to Mr. Crouch.

10 Q Did Mr. Crouch interview you with respect to a
11 position on TBN's Board or did he just offer you a position on
12 TBN's Board?

13 A He asked me a lot about my background. And, so, it
14 was, it was an interview.

15 Q What did you tell him about your background?

16 A I explained to him my experience with the past --
17 Jerry Bernard (phonetic sp.) is my former pastor and my hus-
18 band and I had worked with Reverend Bernard over the years, at
19 that time it was about 20 years, in building a church --
20 helping to build a church in Sacramento and also another one
21 in San Diego. And Reverend Bernard had a television ministry
22 in San Diego where there were people that responded to viewers
23 that called in from the results of his program. And my
24 husband and I were the directors of this department. And we
25 would go out into the community and meet personally with

1 families in their homes and see if there was anything that we
2 could do to help them or to pray with them, things of that
3 nature. And, of course, this was my background for coming to,
4 to Trinity. This gave me a real sense of what Trinity was all
5 about too because of this background and experience that I had
6 had.

7 Q At the time that you spoke with Mr. Crouch about
8 joining TBN's Board, what was the sum total of your broadcast-
9 ing experience?

10 A My broadcasting experience centered around a couple
11 of interviews that I had had on Reverend Bernard's program
12 there in San Diego, so I really didn't have an extensive
13 broadcast background.

14 Q Had you ever served as a director on any corpora-
15 tion, profit or nonprofit, at that point?

16 A No. I had never served personally on a board, but
17 my husband had served on a number of boards, so I was familiar
18 with --

19 Q Had you ever been an officer of any corporation,
20 profit or nonprofit, up to that point?

21 A No, I had not.

22 Q When you became a Director of TBN, were you also
23 given a position as Officer?

24 A In the very beginning I think I was an Officer as
25 well as a Director.

1 Q What position did you hold?

2 A I think it was Assistant Secretary.

3 Q Now, in, in 1979 when you joined TBN as a Director
4 and Assistant Secretary, how many stations did TBN own at that
5 time?

6 A At that time, TBN had just purchased a station in
7 Arizona and I believe that they had an application for the
8 Oklahoma station, but I think that's all we had except Channel
9 40, KTBN, Channel 40, in Los Angeles.

10 Q Do you recall at that time how many employees were
11 already working for TBN?

12 A Well, I couldn't be really accurate. I can only
13 guess there were probably fewer than 100 at that time.

14 Q Was that a guess or, or a --

15 A That's a guess.

16 Q -- an approximation?

17 A That, that -- I -- that's a -- that is a pure guess.
18 I don't really --

19 Q Well --

20 A -- remember.

21 Q Please don't give me guesses.

22 A Okay. Well --

23 Q But if you do have --

24 A -- I don't, I don't know.

25 Q If you have a belief which is based on, on, on

1 knowledge --

2 A I don't.

3 Q -- that, that I would appreciate you sharing with
4 me. But if it's just a pure guess, that --

5 A No, I don't have any, any accurate memory of, of how
6 many people.

7 Q Would you say it was more than 50? Is that a
8 safe --

9 A Oh, yes. I think it was more than 50.

10 Q Did you have any understanding as to what your
11 duties were to be as Assistant Secretary for Trinity
12 Broadcasting?

13 A Yes. I knew that there would be requirements for,
14 for signing checks and purchase orders and that type of thing.

15 Q Up to that point had you had any experience in those
16 areas?

17 A Not any professional experience, no.

18 Q Did it come as a surprise to you that after working
19 at TBN for, what, two weeks you achieved this meteoric rise to
20 the Board of Directors of the company?

21 A It was in a way, but -- how can I explain it to you?
22 It was something that I felt was an answer to, to my prayers,
23 which were very specific in what I wanted to do. I wanted to
24 be involved in ministry, and in that way it wasn't that much
25 of a surprise.

1 Q Were you told whether you would receive a salary or
2 any compensation for your, your work at TBN?

3 A I was a hourly employee in, in the beginning and
4 there was no compensation for being a Director and Officer.

5 Q And for how long did you remain an hourly employee?

6 A It was only a short period of time. And then it was
7 realized that as being a Public Affairs Director I really did
8 have independent decision-making as far as my position as
9 Public Affairs Director, and so I was then made a salaried
10 employee.

11 Q When you say a short period of time, do you mean
12 weeks or months?

13 A Weeks.

14 Q So, by the fall of '79, you were a salaried
15 employee?

16 A Yes. I believe by the fall I was salaried.

17 Q You were Assistant Secretary of the corporation?

18 A Right.

19 Q And you were on the Board of Directors of the corpo-
20 ration?

21 A That's right.

22 Q Would you turn to Bureau Exhibit No. 1, please? I
23 think it indicates where we'll be starting at the beginning.

24 JUDGE CHACKIN: I gather we're going to go through
25 all the exhibits.

1 MR. SCHONMAN: That's what we plan, Your Honor.

2 BY MR. SCHONMAN:

3 Q Mrs. Duff, on page 2 is that your signature?

4 A Yes.

5 Q And I see you've identified yourself as Assistant
6 Secretary?

7 A Yes.

8 Q And that's the position that you held at that time?

9 A Yes.

10 Q And that was in -- on January 30, 1980?

11 A Yes.

12 Q And you signed this in August 1980? Is that
13 correct?

14 A That's -- yes, that's what the document says.

15 Q Did you hold any other positions, any other
16 officerial positions with TBN, that is, any other positions as
17 an Officer other than Assistant Secretary at that time?

18 A Not that I can recall. You know, I was Vice
19 President and Assistant Secretary.

20 Q So, you had two positions?

21 A I, I believe that's correct.

22 Q How did that come about?

23 A Well, at -- it was -- at the time that, unless my
24 memory is -- it's kind of -- I'm almost sure I -- at one
25 point, whether it was in the very beginning or whether it was

1 subsequent -- it may have been the year after. I -- my memory
2 doesn't serve me too well there.

3 Q Now, there came a time when you were ordained by
4 TBN?

5 A Yes.

6 Q What does that mean, to be ordained?

7 A It means that you're set aside to the ministry and
8 you actually have the, the rights to perform sacerdotal
9 (phonetic sp.) functions and you conduct any kind of a service
10 that a minister would perform. My background is having taken
11 a con-- correspondence course at Berean --

12 Q How do you spell that?

13 A Berean, B E R E A N, Bible School in San Diego, and
14 I did this several years before coming to Trinity, but I had
15 never been ordained.

16 Q Now, I'd like to direct your attention to Bureau
17 Exhibit No. 2, and that's a Special Meeting of Trinity
18 Broadcasting Network held on July 14, 1980. Do you see that?

19 A Yes.

20 Q There's a reference in the very first paragraph to
21 an individual by the name of Colby Myers (phonetic sp.). Do
22 you see that?

23 A Yes.

24 Q Is it -- is that a --

25 A I --

1 Q -- a typo?

2 A I think it is. I think it's Colby May (phonetic
3 sp.).

4 Q Thank you. I also see that your husband was -- is
5 ordained. There's a list at the bottom of individuals who are
6 approved for ordination.

7 A That's correct.

8 Q How did that come about, that your husband was
9 ordained?

10 A There was an ordination service at the time that I
11 was ordained and those that were interested in being ordained
12 at the same time were invited to be ordained, even though some
13 of them were not employees of TBN.

14 Q When someone is ordained by the Trinity Minister, is
15 that for a particular period of time?

16 A It's usually reaffirmed on an annual basis.

17 Q If it's not reaffirmed, does the ordination expire
18 at some point?

19 A If the person doesn't ask for it to be reinstated,
20 it does expire as far as Trinity is concerned.

21 Q Mrs. Duff, would you kindly look at page 2 of Bureau
22 Exhibit No. 2 and take a moment to read that reference to the
23 loan commitment for Trinity Broadcasting of Florida?

24 A Yes.

25 Q At the time, did you hold any position with Trinity

- 1 Broadcasting of Florida?
- 2 A I believe I did.
- 3 Q What position was that?
- 4 A I don't remember. It was probably Officer and
5 Director, but I, I don't really remember exactly.
- 6 Q Did your husband hold a position with Trinity
7 Broadcasting of Florida at this time?
- 8 A He did. He was an Assistant Secretary, I believe.
- 9 Q Do you recall how you came to hold these positions
10 with Trinity Broadcasting of Florida?
- 11 A At that time, we were required to do the ascertain-
12 ments prior to purchasing the station and we needed some
13 assistance in doing the ascertainments. And my husband and I
14 went to Florida along with Terri Hickey and we had about 10
15 days to do the ascertainments in the formal manner of over 300
16 -- about 325 people that we had to ascertain in a very short
17 period of time. And it was for that purpose that my husband
18 was made an Officer, so he could help assist us in the
19 ascertainment process.
- 20 Q And similarly for yourself? Is that why you were
21 made --
- 22 A Right.
- 23 Q -- an Officer?
- 24 A Right.
- 25 Q As well as a Director?

1 A I had a much more substantial involvement in the
2 whole process in Florida. I was a part of the telethon team
3 that raised the funds for --

4 Q Go ahead, Ms. Duff. Go ahead.

5 A I was a part of the telethon team that raised the
6 funds for the station and my husband also assisted at that
7 particular time.

8 Q When you travelled to Florida for the purposes of
9 Trinity Broadcasting of Florida, who paid your expenses, if
10 anyone?

11 A My expenses were paid for -- pro-- no. Back that
12 far, I don't really have an accurate memory. But being con-
13 sistent with thin-- the way things worked, it would have been
14 Trinity of Florida that paid the expenses.

15 Q Trinity -- not Trinity Broadcasting Network?

16 A It would depend on whether it was before the station
17 was acquired or after, because I -- the first trip I made was
18 before the station was acquired. So, it would have had to be
19 Trinity Broadcasting of -- Trinity Broadcasting Network that
20 would have paid my initial expenses. So, anything after that
21 I think would have been attributed to the Florida station.

22 Q Now, the reference to the loan commitment on page 2
23 of Bureau Exhibit No. 2, was there ever a, a note reflecting
24 the loan commitment?

25 A Do you know, I honestly don't remember, I haven't

1 | focused on this for so long.

2 | Q Would it have been the practice at the time to
3 | memorialize the commitment in writing?

4 | A It, it may not have been committed to writing,
5 | because there were a common Board of Directors for both of
6 | these corporations. There may not have been an actual note.
7 | I, I don't really remember there being a note.

8 | Q Or at, at this time, and we're talking July 1980,
9 | the Directors of TBN were whom?

10 | A The Directors of TBN would have been Paul Crouch,
11 | myself, Norm Juggert.

12 | Q And as of July 1980, who were the Directors of
13 | Trinity Broadcasting of Florida?

14 | A They would have been the same.

15 | Q Will you please turn to Bureau Exhibit No. 3 and
16 | take a moment -- I'm not going to ask you about the numbers.
17 | What I am interested in are the relationships between the
18 | various companies that are identified on pages 1 and 2. We
19 | have Trinity Broadcasting of Arizona, Trinity Broadcasting of
20 | Denver, Trinity Broadcasting of Florida, of Hawaii, Oklahoma,
21 | of Seattle and of, of Texas. And my question for you is what
22 | is it about all these companies that they would be listed on
23 | this combined balance sheet?

24 | A It would be a common Board of Directors.

25 | Q When you say common Board, you mean --

1 A The same Officers and -- the same Directors, and I
2 think the same Officers too.

3 Q So, in other words, the same three individuals who
4 were serving on Trinity Broadcasting Network's Board, that is,
5 yourself, the Reverend Paul Crouch, and, and Mr. Juggert --

6 A No, I'm, I'm sorry. I, I'm not sure I was on the
7 Board of Arizona. I don't believe I was. I believe that one
8 -- that Board was different and I don't remember who the other
9 Director was. But I'm -- you know, this -- a lot of this is
10 not really clear in my memory because I didn't really -- you
11 know, I haven't focused on this for so many, many years.

12 Q But it's your understanding that these companies, by
13 and large, would have had the same Directors with the excep-
14 tion of perhaps Arizona?

15 A Yes. And I don't remember whether I was on the
16 Denver Board either. But I'm sure I wasn't on Hawaii,
17 Seattle, or Texas, I don't believe -- or probably not even
18 Oklahoma.

19 JUDGE CHACHKIN: Mr. Schonman, do we have any docu-
20 ments showing who the members of the Boards were of these
21 various affiliates?

22 MR. SCHONMAN: Your Honor, for this time period,
23 that would be July 1980, I do not think we have any documents
24 which would reflect the, the composition of, of these
25 companies.